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6
7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,

Case No. 2:23-mj-00370-NJK

9 Plaintiff,

10 v.

11 CARMEN DANIELA IBARRA-ENCISO,
12 aka "Carmen Ibarra,"
aka "Carmen Enciso,"

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

13 Defendant.

14
15 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
16 Frierson, United States Attorney, and Edward G. Veronda, Assistant United States
17 Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public
18 Defender, and Raquel Lazo, Assistant Federal Public Defender, counsel for Defendant
19 CARMEN DANIELA IBARRA-ENCISO, that the Court direct the U.S. Probation Office
20 to prepare a report detailing the defendant's criminal history.

21 This stipulation is entered into for the following reasons:

22 1. The United States Attorney's Office has developed an early disposition
23 program for immigration cases, authorized by the Attorney General pursuant to the
24 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has

1 extended to the defendant a plea offer in which the parties would agree to jointly request an
2 expedited sentencing immediately after the defendant enters a guilty plea.

3 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
4 history until after the defendant enters his guilty plea unless the Court enters an order
5 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
6 a defendant's initial appearance when charged by indictment.

7 3. The U.S. Probation Office informs the government that it would like to begin
8 obtaining the criminal history of defendants eligible for the early disposition program as
9 soon as possible after their initial appearance so that the Probation Office can complete the
10 Presentence Investigation Report by the time of the expected expedited sentencing.

11 4. Accordingly, the parties request that the Court enter an order directing the
12 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

13 DATED this 4th day of May, 2023.

14 Respectfully Submitted,

15 RENE L. VALLADARES
16 Federal Public Defender

JASON M. FRIERSON
United States Attorney

17 /s/ Raquel Lazo
18 RAQUEL LAZO
19 Assistant Federal Public Defender
Counsel for Defendant
IBARRA-ENCISO

/s/ Edward G. Veronda
EDWARD G. VERONDA
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:23-mj-00370-NJK

Plaintiff,

Order Directing Probation to Prepare a Criminal History Report

V.

CARMEN DANIELA IBARRA-ENCISO,
aka "Carmen Ibarra,"
aka "Carmen Enciso,"

Defendant.

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 5th day of May, 2023.


UNITED STATES MAGISTRATE JUDGE